

November 17, 2011

*Via Electronic Filing*

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, D.C. 20554

Re: Ex Parte Notice, Stratos Government Services Petition for Clarification or Declaratory Ruling, WC Docket No. 06-122

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1200, *et seq.*, Harris CapRock Communications, Inc. and CapRock Government Solutions, Inc., wholly owned subsidiaries of Harris Corporation (collectively "Harris"), hereby notifies the Federal Communications Commission ("Commission") of the following ex parte communication in the above-referenced proceeding. On November 15, 2011, Evan Morris, Alan Arnowitz, and EllenAnn Sands of Harris, and Doug Jarrett of Keller and Heckman, met with Ernesto Beckford and Vickie Robinson of the Telecommunications Access Policy Division, Wireline Competition Bureau. The meeting was held to discuss Harris' support of a *Petition for Clarification or Declaratory Ruling*<sup>1</sup> ("Petition") submitted by Stratos Government Services, Inc. ("Stratos") requesting a Commission finding that subcontractors providing interstate telecommunications services exclusively to government and public safety entities are not required to contribute to the Universal Service Fund.

Harris reaffirmed CapRock Communications support<sup>2</sup> of Stratos' Petition and encouraged the Commission to act expeditiously on Stratos' request. Harris believes that the Petition is ripe for action. There is a well established record clearly supporting a Commission interpretation that an entity providing interstate telecommunications exclusively to government and public safety entities, either as a prime contractor *or as a subcontractor*, does not have to contribute to the Universal Service Fund. A subcontractor is merely stepping in the shoes of the prime, just as the prime is stepping in the shoes of the government or public safety entity. The telecommunications provider's place in the "service supply chain" should not matter as long as the provider is exclusively serving government entities.<sup>3</sup>

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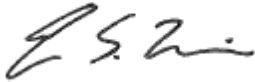
<sup>1</sup> Petition for Clarification or Declaratory Ruling of Stratos Government Services, Inc., WC Docket No. 06-122 (filed Sept. 15, 2009).

<sup>2</sup> Comments of CapRock Government Solutions, Inc., WC Docket No. 06-122 (filed Oct. 29, 2009).

<sup>3</sup> See Federal-State Joint Board on Universal Service, CC Docket No. 96-45, *Report and Order*, 12 FCC Red. 8776, 11800 (Rel. May 8, 1997).

Harris encourages the Commission to confirm that the exemption extends to subcontractors. The Commission should take prompt action in order to promote competitive neutrality and help reduce government IT expenses, within the confines of the existing government end-user exemption, in a time when cost control is critical to government budgets. Additional reasons the Commission should take prompt action are listed on page 6 of the attached presentation. During the presentation Harris also responded to points made by Verizon and Verizon Wireless (hereinafter "Verizon") in opposition to the Stratos' Petition.<sup>4</sup> Harris' rebuttal to Verizon's opposition is on page 7 of the attached presentation.

Respectfully submitted,



Evan S. Morris, Esq.  
Counsel, Government Relations  
Harris Corporation

*Attachments (1)*

CC (via electronic mail):

Ernesto Beckford, Attorney Advisor, Telecommunications Policy Access Division

Patrick Halley, Legal Advisor, Wireline Competition Bureau

Trent Harkrader, Division Chief, Telecommunications Policy Access Division

Vickie Robinson, Deputy Division Chief, Telecommunications Policy Access Division

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<sup>4</sup> Opposition of Verizon and Verizon Wireless, WC Docket No. 06-122 (filed Oct. 30, 2009).